

MAILING ADDRESS NAME ATTN: CONTACT NAME MAILING ADDRESS CITY, STATE ZIP

The purpose of the letter is to inform you that the application for a permit revision has been approved and will be incorporated into Air Quality Permit 940141. The applicable Permit Conditions are enclosed with this letter.

If you need assistance with the permit, please contact the Small Business Assistance/Ombudsman office at 602.506.5102 or contact the undersigned at 602.506.7248. Email communications may be sent to AQPermits@mail.maricopa.gov.



MARICOPA COUNTY AIR QUALITY DEPARTMENT

Engineering and Permitting Division

1001 N. Central Avenue, Suite 400, Phoenix, Arizona 85004 Phone: (602) 506-6010 Fax: (602) 506-6985

AIR QUALITY PERMIT TO OPERATE AND/OR CONSTRUCT

(As required by Title 49, Chapter 3, Article 2, Section 49-480, Arizona Revised Statutes)

ISSUED TO

ME Global Inc 5857 S Kyrene Rd Tempe, AZ 85283

This air quality permit to operate and/or construct does not relieve the applicant of the responsibility of meeting all air pollution regulations.

THE PERMITTEE IS SUBJECT TO THE SPECIFIC AND GENERAL CONDITIONS IDENTIFIED IN THIS PERMIT.

PERMIT NUMBER: 940141 REVISION DATE: 08/18/2015

REVISION NUMBER: 2.1.0.0 EXPIRATION DATE: 12/31/2019

Todd Martin, Non-Title V Permit Supervisor

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Any cited regulatory paragraphs or section numbers refer to the version of the rules and regulations that were in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise. However, in the event the rules and regulations are amended during the term of this Permit, the amended rules and regulations shall apply to this Permit. Whenever the term, Control Officer, is used in this Permit it shall be interpreted to mean, Control Officer or designated representative. Where the term "Rule" appears, it shall be construed to mean "Maricopa County Air Pollution Control Regulations" unless otherwise noted.

SPECIFIC CONDITIONS

Facility-Wide Requirements

1. Allowable Emissions:

The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Daily Emission Limits (pounds)	Twelve Month Rolling Total Emission Limits
Carbon Monoxide (CO)	858	90 tons
Nitrogen Oxide (NOx)	458	48 tons
Sulfur Oxides (SOx)	143	15 tons
PM	477	50 tons
PM_{10}	477	50 tons
$PM_{2.5}$	477	50 tons
Volatile Organic Compounds (VOC)	372	39 tons
Total Organic HAP	NA	4.5 tons
Benzene	9	0.9 tons

- a. The 12-month rolling total emissions shall be calculated monthly by the end of the following month by summing the emissions over the most recent 12 calendar months. The Permittee shall keep this emission record on-site for inspection or submittal upon request.
- b. Upon the request of the Department, the Permittee shall calculate a daily emission rate by dividing the monthly emissions by the number of days of operation for that month..

[Rule 220 §302.2]

2. Compliance Determination:

The Permittee shall determine compliance with the above emission limits using the emission factors listed in the attached Appendix A or in the most recent version of Appendix A resulting from the most recent performance tests.

3. Opacity

No person shall discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20% opacity for a period aggregating more than three minutes in any 60-minute period.

- a. If any non-compliant visible emissions (excluding water vapor) are detected or reported, the Permittee shall determine the cause and/or the source of emissions. The Permittee shall then take immediate corrective action(s) and if necessary, shut down the applicable equipment. If visible emissions (excluding water vapor) exceed the above opacity standards subsequent to implementing corrective action(s), the Permittee shall shut down the applicable equipment and institute repairs or changes necessary to ensure compliance prior to resuming operations.
- b. Compliance with the opacity requirement shall be determined by observations of visible emissions conducted in accordance with EPA Reference Method 9 as modified by EPA Reference Method 203B.

 [Rule 300 §§301, 501]

VOC Containment, Labeling and Disposal:

- a. The Permittee shall not store, discard, or dispose of VOC or materials containing VOC in a way intended to cause or to allow the evaporation of VOC to the atmosphere. All materials from which VOC can evaporate, including fresh solvent, waste solvent and solvent soaked rags and residues, shall be stored in closed containers when not in use;
- b. Such containers one gallon and larger shall be legibly labeled describing their contents;
- c. Records of the disposal/recovery of such materials shall be kept;
- d. Records of disposal/recovery or recycling of VOC shall be kept in accordance with applicable federal, state and local environmental protection requirements;
- e. All containers and mixing tanks containing VOC shall be leak free and shall be kept covered except when the materials are being transferred or when the containers are being cleaned.

[County Rule 330 §306] [County Rule 347 §303] [SIP Rule 347]

5. Odors:

Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

- a. Material Containment Required; Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air in such quantities or concentrations as to cause air pollution smells, aromas or stenches commonly recognized as offensive, obnoxious or objectionable to a substantial part of the community. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be mandatory.
- b. Reasonable Stack Height Required: Where a stack, vent or other outlet is at such a level that air contaminants are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.

[Rule 320 §§ 300, 302, and 303] [SIP Rule 032]

Foundry Operations

6. Material Throughput Limitations for Electric Arc Furnaces (EAF):

- a. The Permittee shall not exceed 250 tons per day of scrap metal raw material process weight throughput for EAF scrap metal melting.
- b. The Permittee shall be limited to a maximum of 55,000 gross tons poured into molds during any twelve consecutive months and 61,000 gross tons charged into the EAF during any twelve consecutive months.

 [County Rule 220 §302.2] [Locally enforceable only]

7. EAF EQ 3 (Includes EAF #2 and #3), EQ 4 and EQ 5 Operating Parameters, Standards and Metal Management Practices:

- a. The Permittee shall limit EAF charge material to plate and structural steel, purchased liners, rail scrap, shop castings and/or foundry returns, gray iron, railroad tie plates, No. 1 heavy melt, stainless steel bundles, hot briquetted iron, direct reduced iron, miscellaneous clean ferrous scrap metal and other materials customarily used in the industry. The use of motor vehicle scrap as defined in §63.10906, mercury switches and or scrap metal coated with antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, and selenium, containing paint or similar surface coating materials as charge material, is not permitted. Other scrap metal materials shall not contain any significant quantities of fuel, oil, grease, bituminous substances, plastic materials or other similar substances capable of volatilizing during the charging and melting processes;
- b. The Permittee shall not operate:

- i. EAF EQ 3 (includes furnaces #2 and #3) unless they are exhausted to the operating and fully functional Dracco MKII Baghouse EO 1.
- ii. Ladle Repair Booth EQ 64 unless it is exhausted to the operating and fully functional Dracco MK II Baghouse EQ 1.
- iii. EAF EQ 4 and EQ 5 unless they are exhausted to the operating and fully functional East Torit 208 Dust Collector EQ 52, and
- iv. Either i., ii. or iii. above unless the general melt shop area is exhausted to the operating and fully functional Torit DFT4-224 Cartridge Dust Collector EQ 2 (north and south) or other emissions control device approved by the Department;
- c. Permittee must operate a capture and collection system for each metal melting furnace. Each capture and collection system must meet accepted engineering standards, such as those published by the American Conference of Governmental Industrial Hygienists and must be operated in accordance with its most recently approved O&M Plan.
- d. Permittee must not discharge to the atmosphere emissions from any metal melting furnace or group of all metal melting furnaces that exceed 0.8 pounds of particulate matter (PM) per ton of metal charged or 0.06 pounds of total metal HAP per ton of metal charged.
- e. The Permittee shall operate each EAF so that air emissions are minimized. Procedures to minimize EAF air emissions shall include, but not be limited to, minimizing the duration of charging a hot EAF and performing maintenance in such a manner that structural openings/gaps are minimized in order to prevent uncontrolled air emissions from entering the ambient air;
- f. Metallic scrap management program. For each segregated metallic scrap storage area, bin or pile, Permittee must comply with the materials acquisition requirements of this section. Permittee must keep a copy of the material specifications onsite and readily available to all personnel with material acquisition duties and provide a copy to each scrap provider. Permittee may have scrap subject to the following provided the metallic scrap remains segregated until charge make-up.
 - i. Restricted metallic scrap. Permittee must prepare and operate at all times according to written material specifications or the purchase and use of only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, chlorinated plastics, or free liquids. The requirements for no free liquids do not apply if Permittee can demonstrate that the free liquid is water that resulted from scrap exposure to rain.
 - ii. General iron and steel scrap. Permittee must prepare and operate at all times according to written material specifications for the purchase and use of only iron and steel scrap that has been depleted (to the extent practicable) of organics and HAP metals in the charge materials used by the iron and steel foundry. The materials specifications must include at minimum for metallic scrap materials charged to a scrap preheater or metal melting furnace to be depleted (to the extent practicable) of the presence of used oil filters, chlorinated plastic parts, accessible lead-containing components (such as batteries and wheel weights), and a program to ensure the scrap materials are drained of free liquids.
- g. For scrap that does not contain motor vehicle scrap, Permittee must procure the scrap pursuant to the requirements in 40 CFR 63.10885(b)(4) for each scrap provider, contract or shipment, certifying in its notification of compliance status and maintaining records of documentation that the scrap does not contain motor vehicle scrap.

[County Rule 220 §302.2, 300 §302.1][40 CFR §63.10885] [40 CFR §63.10895]

8. Mold and Core Making Mixer Operational Requirements:

a. Mold 60 Mixer EQ 9 shall not be operated unless it is exhausted to the operating and fully functional 081-DCTL-084-B-C-M Pulse Jet Dust Collector EQ 65 when installed as scheduled by

the end of 2015. The dust collector shall be operated in accordance with its most recently approved O&M Plan.

b. Mold 80 Mixer EQ 11 shall not be operated unless it is exhausted to the operating and fully functional 100-DCTL-084-B-C-M Pulse Jet Dust Collector EQ 66 when installed as scheduled during 2016. The dust collector shall be operated in accordance with its most recently approved O&M Plan.

9. Mold and Core Making Standards & Material Limits – Binder Requirements:

- a. For each facility-specified workday in which molds are made, the ratio of organic binder-material in all binder used to all sand receiving binder shall not exceed 1.35 to 100, by weight, as determined by the formula contained in Rule 347 Section 503.6:
 - i. The organic material in binders that contain no more than 5% organic compounds by weight is excluded from inclusion in the formula.
 - ii. Failure to obtain the sand ordinarily used for molding shall not be an excuse to exceed the binder-to-sand ratio limit pursuant to this condition, except as is provided in Rule 100, Section 501.

[Rule 347 §§ 301.2, 503.6] [SIP Rule 347]

- b. The Permittee shall have a systematic program to demonstrate compliance with organic binder-sand ratio as follows:
 - i. The program shall consist of devices and/or other effective means, which each day accurately indicates the amount of sand and the amount of binder, catalyst and any other additive that contains organic compounds and is incorporated into the molding sand.
 - ii. Such program shall be in effect continuously during the mixing of binder with molding sand, and shall be of sufficient accuracy and consistency as to determine compliance with Subsection (a) of this Condition.
 - iii. Any devices that are part of the program and are resettable shall be so protected as to preclude resetting by personnel not designated by the operator.
 - iv. The systematic program shall include a complete, written description of its correct functioning, and shall be subject to the Control Officer's approval.

[Rule 347 §§ 302.2, 503.6] [SIP Rule 347]

- c. Calibration of Metering Equipment on the Sand/Resin Mixer:
 - i. Each month or as often as calibration is prescribed by the operating instructions supplied by the manufacturer, whichever is more frequent, the amount of sand delivered per minute at each different sand-supply rate for each different sand-supply equipment configuration in current use shall be determined prior to any adjustment, and recorded. The same shall be done for the binder at each resin ratio setting and for the catalyst flow meter if one is used pursuant to required calculations.
 - ii. If adjustment is made to any device of which such adjustment can affect the flow rate, a flow rate test shall be performed subsequent to completion of adjustment, and the result recorded.

[Rule 347 § 503.1] [SIP Rule 347]

- d. Storage and Disposal of Binders, Solvents, and Other VOC containing Material:
 - i. Storage: The Permittee shall cover and keep covered or enclosed each uncured binder material, any solvents, and any other VOC-containing material which are not in use. The Permittee shall store binder materials and cleaning materials in closed or covered containers.
 - ii. Disposal Of VOC And VOC-Containing Material: The Permittee shall store all waste materials containing any VOC in fluid form, including but not limited to uncured binder components, rags, waste coatings, waste solvents and their residues, in closed containers. Such containers shall have labels that legibly identify their contents and shall remain covered except when contents are being

added or removed.

[Rule 347 § 303] [SIP Rule 347]

10. Mold and Core Making - Surfacing Materials:

The Permittee shall use only water based mold and core surfacing material or shall comply with the following limits when using mold or core surfacing material containing VOC:

- a. The Permittee shall limit the VOC content of mold-wash or other mold surfacing materials to 1.0 lb VOC/gal (120 g VOC/L).
- b. In lieu of observing the mold-wash VOC limit in Subsection (a) of this Condition, the Permittee may choose to average the mold-wash VOC content over each completed facility-specified workday, pursuant to all provisions as follows:
 - i. For each facility-specified workday, the average mold-wash VOC content shall be recorded within 13 hours after the start of the following facility-specified workday, using the formula in Rule 347, Section 503.7; and
 - ii. The average mold-wash VOC content shall not exceed 0.90 pounds VOC per gallon.

[Rule 347 §§ 301.3, 503.7] [SIP Rule 347]

11. Record Keeping for Mold and Core Making:

The Permittee shall keep the following records and lists in a consistent and complete manner, and shall make them available to the Control Officer upon request. Records of the previous 12 months, requested during normal business hours, shall be made available without delay. Each of the following records shall be maintained for a minimum of five years:

a. Current List:

- i. Maintain a current list of all VOC-containing fluid materials as received by the facility such as binders and/or binder components, coatings, cleaning solvents, lubricants and any other VOC-containing substances.
- ii. List the name or designation of each and include next to it the VOC content of each in pounds per gallon or grams per liter.
- iii. This requirement does not apply to materials having less than 2 percent organic content by volume as received.

b. Monthly Schedule:

By the end of the following month, an owner or operator shall update the following records for each completed month:

- i. The amount of each binder constituent used.
- ii. The amount of each mold-wash and surfacer used.
- iii. The quantity and type of VOC-containing solvent added each month as a diluent in binders, moldwash, surfacer, or as a diluent in some other production capacity.
- iv. The quantity of fluid VOC or material containing any fluid VOC disposed of offsite. This includes VOC on rags, sand, and other materials.
- v. Annual Exception: Yearly, update the totals of the usage of each fluid, VOC-containing material that is known to be used in amounts totaling less than 15 gallons (57 liters) per year for all that type of material.
- c. Frequency of Computing the Binder-to-Sand Ratio:
 - i. Monthly: Computations of mass balance for the month shall be made according to the period-weighted average formula in Section 503.6 of Rule 347 within 7 workdays after the end of the month.
 - ii. Daily from Meter Readings: Such calculations for each day, determined with the numerical

output(s) of the system run pursuant to this Permit Condition shall be completed and entered in a log by 12:01 PM of the following workday or by the middle of the first shift of the following facility-specific workday.

- iii. Reduced Frequency of Determination for Ratios Below Limits:
 - Earning weekly determinations: If no daily ratios exceed 1.27: 100 for forty consecutive workdays and no weekly ratio is above 1.25: 100 during the same period, then weekly averaging may be instituted in place of daily calculations of the daily average, until such time as that weekly ratio is exceeded. Following such an exceedance, daily determinations shall be resumed.
 - 2) If there is no weekly average ratio above 1.20: 100 for 10 consecutive weeks, then the following schedule may be followed:
 - a) Determine each month's average by the middle of the first full, facility-specified workday of the following month; and
 - b) In each month, determine the weekly average-ratio of a single, selected week in that month by the middle of the first full workday of the following week. The selected week shall be either the week specified in (i) or shall be the week specified by the Control Officer pursuant to (ii):
 - i) Determine the weekly average ratio for the week that falls immediately after the 3rd full work-week of the month.
 - ii) The Control Officer may from time to time designate to the operator a random work-week of the month for determination of that week's average organic-compound to sand ratio. The Control Officer shall notify the operator prior to the commencement of production activities for the designated work-week.
 - c) Determine the weekly average ratio by the middle of the first full workday of the following week. If any monthly average ratio exceeds 1.19:100 or if any weekly average exceeds 1.20: 100, then weekly averaging shall be resumed, unless the daily ratio maximum in Subsection c.iii.1) of this Permit Condition is also exceeded, in which case daily determinations shall be resumed pursuant to Subsection c.ii. of this Permit Condition
 - 3) The schedule of determinations pursuant to Subsections c.iii.1) and 2) of this Permit Condition is disallowed if any exceedance or violation occurs of said schedule or of this Permit Condition requirements. In either case, the operator shall then resume each schedule in Subsection c.i and ii. of this Permit Condition
 - 4) Reinstatement: Should an operator desire to reinstate a schedule provided in Subsection c.iii, of this Permit Condition the operator shall make such a request, in writing, to the Control Officer. The request shall state changes or improvements that make meeting the schedule's requirements reasonably certain. The Control Officer shall approve or deny such a request in writing.

[Rule 347 § 501] [SIP Rule 347]

12. Mold Pouring and Cooling Operating Parameters - Particulate Matter and Odor Control:

- a. The Permittee shall not commence mold pouring operations without exhausting the pouring bay to the operating and fully functional AAF MILLENIUM BAGHOUSE (EQ. 32) and CARBON ADSORPTION, FABRIC FILTERS, ODOR ABATEMENT SYSTEM UNITS #1 AND #2, EQ. 33:
- b. The Permittee shall monitor, operate and maintain the mold pouring and cooling bay baghouse and carbon adsorption odor control system identified in paragraph a. in accordance with the most recently approved O&M Plan to ensure that the emissions limitations of these Permit Conditions are not exceeded. In the event the baghouse and carbon adsorption odor control system identified in paragraph

a. malfunctions, rendering the system ineffective as a particulate matter and odor control system, the Permittee is only permitted to tap molten metal from any EAF that had already begun the melting cycle at the time of the malfunction. The Permittee may not resume metal melting/pouring operations until the baghouse and carbon adsorption odor control system identified in paragraph a. has been repaired and is fully operational;

[County Rule 220 §302.2] [Locally enforceable only]

13. Record Keeping for Mold Pouring and Cooling:

The Permittee shall keep records of the following:

- a. Daily records of the total weight of metal poured into molds;
- b. The time of day metal melting started and the time of day that metal melting ended;
- c. The weekly carbon adsorption odor control system exhaust sampling record of organic compound concentration;
- d. The date organic compound concentrations approach breakthrough in the carbon adsorption odor control system exhaust;
- e. The date new activated carbon or regenerated/reactivated carbon replacement was completed.

[County Rule 220 §302.7] [Locally enforceable only]

14. Mold Shakeout Operations Operating Parameters:

The Permittee shall not operate any mold shakeout equipment unless:

- a. The east shakeout equipment is exhausted to an operating and fully operational emissions control device, **DUST COLLECTOR**, **ICA**, **EQ 27** and the west shakeout equipment is exhausted to an operating and fully functional emissions control device, **DUST COLLECTOR**, **ICA/AAF MILLENIUM**, **EQ 28** and the shakeout area fugitive emissions are exhausted to an operating and fully functional emissions control device, **DUST COLLECTOR**, **AAF MILLENIUM**, **EQ 31**.
- b. The West Didion Rotary Drum/Conveyors EQ 55 west shakeout/sand attrition equipment exhausts to an operating and fully functional emissions control device, TORIT BAGHOUSE, RF EQ 12 and the East Didion Rotary Drum/Conveyors EQ 56 east shakeout/sand attrition equipment exhausts to an operating and fully functional emission control device, TORIT BAGHOUSE, RF EQ 13.
- c. Emissions containment methods are operating that utilize capture hooding or equivalent methods to reduce emissions. All the aforementioned control devices shall be operated in accordance with their most recently approved O&M Plans.

[County Rule 220 §302.2] [Locally enforceable only]

15. Thermal Sand Reclamation System Operating Parameters:

The Permittee shall not operate the **Thermal Sand Reclaimer**, **Thermfires**, **EQ 14A and 14B** unless exhausted to an operating and fully functional emission control device, **BAGHOUSE**, **AAF MILLENIUM**, **EQ. 15** operating in accordance with its most recently approved O&M Plan.

[County Rule 220 § 302.2] [Locally enforceable only]

16. Sand System: 200/400 Ton Reclaim Sand Storage Silo and Other Sand Handling Silos and Surge Tanks Operating Parameters:

- a. The Permittee shall not operate the primary and secondary **200 Ton Reclaim Sand Storage Silos (EQ.** #57) and (EQ# 20) which receive sand from the East Dideon sand Reclaim system (EQ#56) unless they have operating and fully functional overflow warning system indicators installed that are designed to alert operators to stop the flow of sand when the sand reaches a capacity that could adversely impact pollution abatement equipment and are exhausted to operating and fully functional emissions control device **TORIT BIN VENT EQ 59** operating in accordance with its most recently approved O&M Plan.
- b. The Permittee shall not operate the 400 ton New Sand Silos (EQ 19 & 58) unless they have operating

and fully functional overflow warning system indicators installed that are designed to alert operators stop the flow of sand when the sand reaches a capacity that could adversely impact pollution abatement equipment and are exhausted to an operating and fully operational MODU KLEEN BIN VENT EQ 62 & TORIT BIN VENT EQ 59 respectively, operating in accordance with their most recently approved O&M Plan.

- c. Permittee shall not operate the primary 200 Ton Reclaim Sand Storage Silo (EQ 63) which receives sand from the West Dideon sand reclaim System (EQ 55) unless it has operating and fully functional overflow warning system indicators installed that are designed to alert operators to stop the flow of sand when the sand reaches a capacity that could adversely impact pollution abatement equipment and is exhausted to an operating and fully operational WEST ATT BAGHOUSE (EQ 12) operating in accordance with its most recently approved O&M Plan.
- d. Permittee shall not operate the 30 Ton Surge Sand Silo (EQ 22), the 20 Ton Surge Tank (Indoors, EQ 25), the 20 Tons Surge Sand Tank (Outdoors, EQ 25), the 40 Ton Surge Tank (EQ 21), the 50 Tons surge Tank (Indoors, EQ 24) and the 50 Ton Surge Tank (Outdoors EQ 24) unless they have operating and fully functional overflow warning system indicators installed that are designed to alert operators to stop the flow of sand when the sand reaches a capacity that could adversely impact pollution abatement equipment and are exhausted to operating and fully functional ECS (EQ 60), or (EQ 62) operating in accordance with its most recently approved O&M Plan, identified in the Sand System Flow Diagram and the most recent version of the Equipment List.

[County Rule 220 § 302.2][County Rule 241 §302][Locally enforceable only]

17. Recordkeeping for the Sand System

- a. Permittee shall keep monthly records of the amount of sand by weight shaken from the East Shakeout equipment and transferred to the East Dideon Sand Reclaim System EQ 56 and Silos EQ 20 and EQ 57 and the amount of sand by weight shaken from the West Shakeout equipment and transferred to the West Dideon Sand Reclaim System EQ 55 and Silo EQ 63.
- b. Permittee shall keep monthly records of the amount of sand by weight transferred from new sand rail cars to the 400 ton new sand silo EO 58 and to the 400 ton new sand silo EO 19.

18. Finishing Department Operating Parameters – Arc Washing:

The Permittee shall not operate the **Arc Washing Station EQ 5** (On De Minimis List) unless the equipment is exhausted to an operating and fully functional emissions control device, **ARC AIR COLLECTOR**, **EQ 49** operating in accordance with its most recently approved O&M Plan.

[County Rule 220 § 302.2] [Locally enforceable only]

19. Finishing Department Operating Parameters – Swing Grinders:

The Permittee shall not operate **Swing Grinder metal finishing equipment EQ 38 and EQ 39** unless the equipment is exhausted to an operating and fully functional **ECS**, **DUST COLLECTOR-AAF MILLENIUM**, **EQ 40** operating in accordance with its most recently approved O&M Plan.

[County Rule 220 § 302.2] [Locally enforceable only]

20. Finishing Department Operating Parameters & Recordkeeping: Shot Blasting

- a. The Permittee shall not operate **shot blast Wheelabrator Table Blast metal finishing equipment EQ 41** unless the equipment is exhausted to an operating and fully functional emissions control device, **BAGHOUSE-MIKROPUL, EQ 42** operating in accordance with its most recently approved O&M Plan.
- b. The Permittee shall not operate **shot blast Wheelabrator Jet Wheel Blasthouse metal finishing equipment EQ 43** unless the equipment is exhausted to an operating and fully functional emissions control device, **BAGHOUSE-JET III 108, EQ 44** operating in accordance with its most recently approved O&M Plan.
- c. All shot blasting operations shall be performed in a confined enclosure by equipment the same as or similar to the equipment identified herein as the Wheelabrator Table Blast, EQ 41 and the Wheelabrator Jet Wheel Blast House EQ 43, i.e., the shot is propelled by paddle wheels in the

blasting operation and not by compressed air or by a pressurized liquid.

d. Work Practices:

At the end of the work shift, the Permittee shall clean up spillage, carry-out, and/or trackout of any spent shot blast material with a potential to be transported during a wind event.

[Rule 220, §302]

Emission Control Systems (ECS):

21. ECS Requirements

- a. The Permittee shall control emissions from the ECS listed in Permit Condition 20.a. operating in accordance with an approved operation and maintenance plan.
- b. For the purposes of this Permit Condition, a properly functioning ECS shall be defined as having a removal efficiency of at least a minimum of 99% by weight removal efficiency for PM10 as demonstrated by manufacturer's specifications or have a stack outlet grain loading of 0.01 gr/dscf or less of PM10 as measured by county approved performance tests.
- c. The Permittee shall establish procedures to control emissions of particulate matter into the ambient air during the transfer of collected ECS dust to storage bins or containers;
- d. The Permittee shall operate each ECS in such a manner so as not to discharge into the atmosphere emissions of any air contaminants in an amount greater than the Opacity Requirements of Permit Condition 3.
- e. Additional Requirements for Carbon Adsorption System ECS
 - i. The Permittee shall perform weekly stack sampling of the carbon adsorption odor control system by measuring the inlet and outlet exhaust gases for total volatile organic compound concentration with an organic vapor analyzer or equivalent device approved by the Control Officer. This stack sampling shall be accomplished to facilitate making the determination whether or not the activated carbon has reached the break through point and has become or is approaching complete saturation (organic compound breakthrough). Within 120 days after Department approval of the source test report for the carbon adsorption odor control system, the Permittee shall submit to the Department, for approval by the Control Officer, a detailed description of the weekly sampling test equipment, test methodology and the organic compound concentration in the exhaust gases used to determine whether or not the activated carbon in the bed(s) has reached the break through point and has become or is approaching organic compound breakthrough. In no event shall the VOC content of the exhaust gases from the carbon adsorption units exceed 10 ppm. The purpose of this testing is to use VOC as a surrogate for the control of odor not for the control of VOC;
 - ii. Upon making the determination that the activated carbon in the beds has reached the break through point and is approaching organic compound breakthrough, the Permittee shall replace the activated carbon in the appropriate cells with either new activated carbon or regenerated/reactivated carbon within ten working days.

[Rule 311 §304][Rule 241 §302] [Locally Enforceable Only]

22. Operation and Maintenance (O & M) Plan Requirements:

a. Permittee must prepare and operate at all times according to a written O&M Plan for each emission control system (ECS) subject to a PM, metal HAP or opacity emissions limit in 40 CFR 63.10895 and shall comply with the most recently approved O&M Plans for each ECS including the following devices. The Permittee shall revise the O&M Plan upon the request of the Department and whenever substantive changes are made to the equipment or plan, in accordance with the Department guidelines:

DRACCO MKII BAGHOUSE, ARC FURNACES, EQ 1, EAST TORIT #208 DUST COLLECTOR, ARC FURNACES, EQ 52,

TORIT DFT4-224 DUST COLLECTOR, FUGITIVE DUST ARC FURNACE AREA, EQ 2 (NORTH AND SOUTH),

AAF MILLENIUM BAGHOUSE, MOLDS IN POURING BAY, EQ. 32,

CARBON ADSORPTION UNITS #1 AND #2, MOLDS IN POURING BAY, EQ. 33,

DUST COLLECTOR, ICA, EAST MOLD SHAKEOUT, EQ 27,

DUST COLLECTOR, ICA/AAF MILLENIUM, WEST MOLD SHAKEOUT, EQ 28,

DUST COLLECTOR, AAF MILLENIUM, FUGITIVE DUST SHAKEOUT AREA, EQ 31,

TORIT BAGHOUSE, RF WEST ATTRITION, EQ 12,

TORIT BAGHOUSE, RF EAST ATTRITION, EQ 13,

AAF MILLENIUM, BAGHOUSE, THERMFIRE EQ. 15,

TORIT BIN VENT EQ 59 (2 UNITS), EQ 60 (5 UNITS),

MODU KLEEN BIN VENT EQ 62 (2 UNITS)

ARC AIR DUST COLLECTOR, ARC WASHING STATION, EQ 49,

AAF MILLENIUM DUST COLLECTOR, SWING GRINDER WORK AREA, EQ 40,

MIKROPUL BAGHOUSE WHEELABRATOR TABLEBLAST, EQ 42.

JET III 108 BAGHOUSE, WHEELABRATOR JET WHEEL, EQ 44

081-DCTL-084-B-C-M PULSE JET DUST COLLECTOR EQ 65

100-DCTL-084-B-C-M PULSE JET DUST COLLECTOR EQ 66

- b. The Operation and Maintenance (O&M) Plan shall specify key system operating parameters, such as temperatures, pressures and/or flow rates, necessary to determine compliance and describe in detail procedures to maintain the approved emission control system. The Permittee shall monitor, operate and maintain the equipment in accordance with the device's approved O&M Plan. At a minimum the plan shall include:
 - i. General facility and contact information;
 - ii. Positions responsible for inspecting, maintaining, and repairing emissions control devices which are used to comply with this subpart;
 - iii. Description of items, equipment and conditions that will be inspected, including and inspection schedule for the items, equipment, and conditions. For baghouses that are equipped with bag leak detection systems, the O&M plan must include the site-specific monitoring plan required in 40 CFR §63.10897(d)(2).
 - iv. Identity and estimated quantity of the replacement parts that will be maintained in inventory;
 - v. Carbon Adsorption System: Inlet and outlet temperature of the adsorption system gases and effluent concentration per the requirements of Permit Condition 20.e.
 - vi. Baghouse: Baghouse pressure drop and visible emissions (possibly inlet temperature, depending on application).
- c. Permittee may use any other O&M, preventative maintenance, or similar plan which addresses the requirements in b. i. through b. vi. of this section to demonstrate compliance with the requirements for an O&M plan.
- d. Changes to an existing O&M Plan shall be made by submitting a complete, revised O&M Plan along with a cover letter identifying all changes and the reason for such changes. The Permittee may implement the changes addressed in the revised O&M plan after it submits the revision to the Department. Unless disapproved in writing by the Department, the Permittee shall continue to operate in accordance with the revised O&M plan.
- e. If any control device is found to be operating outside a specified range, the Permittee shall immediately take corrective action to bring the device back into the specified operating range or shut down the device and the associated equipment vented to it.
- f. If a pattern of excursions, as determined by the Department or the Permittee, of operation outside the specified operating range develops, the Permittee shall submit for Department approval a Corrective Action Plan to bring the devices back into the specified operating range. The Plan shall be submitted to the Department, Attn: Compliance Manager, within 30 days of the determination of the existence of excursions.

[40 CFR §63.10896] [Rule 220 § 302.4]

23. Monitoring and Recordkeeping

The Permittee shall keep the following records on site and available upon request. The records shall be retained for 5 years.

- a. Monitoring and maintenance records specified in the O&M Plan:
 - i. Monitoring Records shall consist of an operations log sheet to be completed for every day the process and/or control device is in operation. Operations log sheets shall, at a minimum, contain the following information: equipment identification; date and time of readings; identification of the individual recording the data; operating parameters to be monitored including units of measure, operating limits (upper and lower limits), and locations for recording measurements; measurement frequency; and if applicable, corrective action taken. An explanation shall be recorded for any periods of operation when the control device was not operating.
 - ii. Maintenance Records shall, at a minimum, contain the following information: equipment identification; date; identification of the individual performing the maintenance check; procedures to be performed including frequency of occurrence; results of inspection (acceptable, nozzle plugged, belt cracked, etc.); and corrective action taken (none, cleaned nozzle, replaced belt, etc.).
- b. Whenever the O&M Plan requires that maintenance be performed, a record shall be made of the maintenance actions taken within 24 hours of maintenance completion.
- c. An explanation shall be recorded for any scheduled maintenance that is not performed during the period designated in the O&M Plan.
- d. Permittee must make monthly inspections of the equipment that are important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). The inspection must include observations of the physical appearance of the equipment (e.g., presence of holes in the ductwork or hoods, flow constrictions caused by dents or accumulated dust in the ductwork, and fan erosion). Permittee must repair any defect or deficiency in the capture system as soon as practicable, but no later than 90 days. Permittee must record the date and results of each inspection and the date of repair of any defect or deficiency.
- e. Permittee must install, operate, and maintain each measurement device according to the O&M plan and record all information needed to document conformance with these requirements.
- f. In the event of an exceedance of an established emissions limitation (including an operating limit), Permittee must restore operation of the emission source (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the exceedance. Permittee must record the date and time corrective action was initiated, the corrective action taken, and the date corrective action was completed.
- g. Permittee must keep records of its written materials specifications according to \$63.10885(a) and records that demonstrate compliance with the requirements for restricted metallic scrap in \$63.10885(a)(1) and/or for the use of general scrap in \$63.10885(a)(2) and for mercury in \$63.10885(b)(1) through (3), as applicable. Permittee must keep records documenting compliance with \$63.10885(b)(4) for scrap that does not contain motor vehicle scrap.
- h. Permittee must keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line as required by \$63.10886. These records must be the Material Safety Data Sheet (provided that it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.
- i. Permittee must keep records of the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. These records must be copies of purchasing records, Material Safety Data Sheets, or other documentation that provide information on the binder or

- coating materials used.
- j. Permittee must keep records of monthly metal melt production for each calendar year.
- k. Permittee must keep a copy of the operation and maintenance plan as required by §63.10896(a) and records that demonstrate compliance with plan requirements.
- 1. Permittee must keep records of capture system inspections and repairs as required by §63.10897(e).
- m. Permittee must keep records demonstrating conformance with specifications for the operation of measurement devices as required by §63.10897(f).
- n. Permittee must keep records of corrective action(s) for exceedances and excursions as required by §63.10897(g).
- o. Permittee must record the results of each inspection and maintenance required by §63.10897(a) for PM control devices in a logbook (written or electronic format). Permittee must keep the logbook onsite and make the logbook available to the Administrator/Control Officer upon request. Permittee must keep records of the date and time of each recorded action for a fabric filter, the results of each inspection, and the results of any maintenance performed on the bag filters.
- p. Permittee must submit written notification to the Administrator of the initial classification of its new or existing affected source as a large iron and steel facility as required in \$63.10880(f) and (g), as applicable, and for any subsequent reclassification as required in \$63.10881(d) or (e), as applicable.
- q. Permittee of an affected source subject to the provisions of this part shall maintain relevant records for such source of
 - i. The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;
 - ii. The occurrence and duration of each malfunction of operation (i.e., process equipment) or the required air pollution control and monitoring equipment;
 - iii. All required maintenance performed on the air pollution control and monitoring equipment;
 - iv. Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3)); or
 - Actions taken during periods of malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3));
 - v. All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events);

[40 CFR 63.10][40 CFR 63.10897][40 CFR 63.10899[Rule 220 § 302.7]

Fuel Burning

24. Operational Limitations:

The Permittee may use only natural gas, butane and propane as fuels for ovens, furnaces, heaters, boilers and/or any other external combustion equipment.

[County Rule 220 §302.2] [Locally enforceable only]

25. Record Keeping:

The Permittee shall maintain monthly records of the quantity of each fuel burned at the facility.

[County Rule 220 §§302.2; 302.7] [Locally enforceable only]

Fugitive Dust from Dust-Generating Operations

26. Applicability:

- a. The provisions of this Permit Section apply to all dust-generating operations except for those dust-generating operations listed in the Condition below. Any person engaged in a dust-generating operation subject to this Permit Section shall be subject to the standards and/or requirements of this Permit Section before, after, and while conducting such dust-generating operation, including during weekends, after work hours, and on holidays.
- b. For the purpose of Rule 310, any control measure that is implemented must achieve the applicable standard(s) described in Rule 310, as determined by the corresponding test method(s), as applicable, and must achieve other applicable standard(s) set forth in Rule 310.
- c. Regardless of whether a dust-generating operation is in compliance with an approved Dust Control Plan or there is no approved Dust Control Plan, the owner and/or operator of a dust-generating operation shall be subject to all requirements of Rule 310 at all times.
- d. Failure to comply with the provisions of these requirements, as applicable, and/or of an approved Dust Control Plan, shall constitute a violation.

[SIP Rule 310 §§102, 301]

27. Exemptions:

The provisions of this Permit Section shall not apply to the following activities:

- a. Emergency activities that may disturb the soil conducted by any utility or government agency in order to prevent public injury or to restore critical utilities to functional status.
- b. Establishing of initial landscapes without the use of mechanized equipment or conducting landscape maintenance without the use of mechanized equipment. However, establishing initial landscapes without the use of mechanized equipment and conducting landscape maintenance without the use of mechanized equipment shall not include grading or trenching performed to establish initial landscapes or to redesign existing landscapes.

[SIP Rule 310 §103]

28. Colocation

The Permittee shall not co-locate any crushing & screening, hot mix asphalt plant and/or concrete batch facilities with the equipment covered by this permit as documented in the equipment list. Co-located sources are those located on contiguous or adjacent properties, which are under common control of the Permittee.

[Rule 200 §303.3.c]

29. Dust Control Plan Requirements:

- a. The owner and/or operator of a dust-generating operation shall submit to the Control Officer a Dust Control Plan with any permit applications that involve dust-generating operations with a disturbed surface area that equals or exceeds 0.10 acre (4,356 square feet) before commencing any routine dust-generating operation. The Dust Control Plan shall be kept available onsite at all times.
- b. The Permittee shall comply with the requirements of the Dust Control Plan and the provisions of MCAQD Rule 310 Sections 301 310 at all times.

[SIP Rule 310 §§ 301-310, 302.3, 409]

30. Visible Emission Requirements for Dust-Generating Operations:

- a. The Permittee shall not cause or allow visible fugitive dust emissions to exceed 20% opacity.
- b. The Permittee shall not cause or allow visible emissions of particulate matter, including fugitive dust,

beyond the property line within which the emissions are generated. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined by using EPA Reference Method 22. This requirement does not apply to dust-generating operations conducted within 25 feet of the property line.

[SIP Rule 310 §303.1]

31. Exemptions from Dust-Generating Operation Opacity Limitation Requirement:

- a. If wind conditions cause fugitive dust emissions to exceed the opacity requirements in this permit, despite implementation of the Dust Control Plan, an owner and/or operator shall:
 - i. Ensure that all control measures and requirements of the Dust Control Plan are implemented and the subject violations cannot be prevented by better application, operation, or maintenance of these measures and requirements.
 - ii. Cease dust-generating operations and stabilize any disturbed surface area consistent with the Stabilization Requirements of these conditions.
 - iii. Compile records consistent with the recordkeeping requirements of these Permit Conditions and document the control measure and other Dust Control Plan requirements implemented.
- b. Emergency Maintenance of Flood Control Channels and Water Retention Basins: The opacity limit shall not apply to emergency maintenance of flood control channels and water retention basins, provided that control measures are implemented.

[SIP Rule 310 §303.2]

32. Stabilization Requirements for Dust-Generating Operations:

a. Unpaved Parking Lot: The owner and/or operator of any unpaved parking lot shall not allow visible fugitive dust emissions to exceed 20% opacity and shall not allow silt loading equal to or greater than 0.33 oz/ft. However, if silt loading is equal to or greater than 0.33 oz/ft, then the owner and/or operator shall not allow the silt content to exceed 8%. An unpaved parking lot includes any area that is not paved and that is used for parking, maneuvering, material handling, or storing motor vehicles and equipment

[SIP Rule 310 §§ 232, 304.1]

b. Unpaved Haul/Access Road:

An unpaved haul/access road includes any on-site road or equipment path that is not paved and is used by commercial, industrial, institutional, and/or governmental traffic.

i. The owner and/or operator of any unpaved haul/access road (whether at a work site that is under construction or at a work site that is temporarily or permanently inactive) shall not allow visible fugitive dust emissions to exceed 20% opacity and shall not allow silt loading equal to or greater than 0.33 oz/ft². However, if silt loading is equal to or greater than 0.33 oz/ft², then the owner and/or operator shall not allow the silt content to exceed 6%.

[SIP Rule 310 §§ 231, 233]

ii. The owner and/or operator of any unpaved haul/access road (including at a work site that is under construction or a work site that is temporarily or permanently inactive) shall, as an alternative to meeting the stabilization requirements for an unpaved haul/access road in i of this Condition, limit vehicle trips to no more than 20 per day per road and limit vehicle speeds to no more than 15 miles per hour. If complying with this subsection of this Permit, the owner and/or operator must include, in a Dust Control Plan, the maximum number of vehicle trips on the unpaved haul/access roads each day (including number of employee vehicles, earthmoving equipment, haul trucks, and water trucks) and a description of how vehicle speeds will be restricted to no more than 15 miles per hour.

[SIP Rule 310 §304.2]

c. Disturbed Surface Area: The owner and/or operator of any disturbed surface area on which no activity is occurring (including at a work site that is under construction or a work site that is temporarily or

permanently inactive) shall meet at least one of the standards described below, as applicable. Should such a disturbed surface area contain more than one type of stabilization characteristic, such as soil, vegetation, or other characteristic, which is visibly distinguishable, then the owner and/or operator shall test each representative surface separately for stability, in an area that represents a random portion of the overall disturbed conditions of the site, in accordance with the appropriate test methods described in Section 501.2(c) of Rule 310 and in Appendix C (Fugitive Dust Test Methods) of MCAQD rules. The owner and/or operator of such disturbed surface area on which no activity is occurring shall be considered in violation of Rule 310 if the area is not maintained in a manner that meets at least one of the standards listed below, as applicable. An area is considered to be a disturbed surface area until the activity that caused the disturbance has been completed and the disturbed surface area meets the standards described in this subsection.

- Maintain a soil crust:
- ii. Maintain a threshold friction velocity (TFV) for disturbed surface areas corrected for non-erodible elements of 100 cm/second or higher;
- iii. Maintain a flat vegetative cover (i.e., attached (rooted) vegetation or unattached vegetative debris lying on the surface with a predominant horizontal orientation that is not subject to movement by wind) that is equal to at least 50%;
- iv. Maintain a standing vegetative cover (i.e., vegetation that is attached (rooted) with a predominant vertical orientation) that is equal to or greater than 30%;
- v. Maintain a standing vegetative cover (i.e., vegetation that is attached (rooted) with a predominant vertical orientation) that is equal to or greater than 10% and where the threshold friction velocity is equal to or greater than 43 cm/second when corrected for non-erodible elements;
- vi. Maintain a percent cover that is equal to or greater than 10% for non-erodible elements; or
- vii. Comply with a standard of an alternative test method, upon obtaining the written approval from the Control Officer and the Administrator.

[SIP Rule 310 §304.3]

33. Soil Moisture:

If water is the chosen control measure in an approved Dust Control Plan, the owner and/or operator of a dust-generating operation shall operate a water application system on-site (e.g., water truck, water hose) while conducting any earthmoving operations on disturbed surface areas 1 acre or larger, unless a soil crust is maintained or the soil is sufficiently damp to prevent loose grains of soil from becoming dislodged.

[SIP Rule 310 §307]

34. Dust Control Training Classes for Dust-Generating Operations:

- a. At least once every three years, the following people shall successfully complete a Basic Dust Control Training Class conducted or approved by the Control Officer.
 - i. Water truck drivers.
 - ii. Water-pull drivers.
 - iii. The site superintendent or other designated on-site representative of the permit holder.
- b. Any certification issued to a person having successfully completed a Basic Dust Control Training Class conducted or approved by the Control Officer may be suspended or revoked for cause, including, but not limited to, inappropriate ethical activities or conduct associated with the dust control program.

[SIP Rule 310 §309.1]

35. Dust Control Plan Revisions

a. If the Control Officer determines that an approved Dust Control Plan has been followed, yet fugitive dust emissions from any dust-generating operation still exceed the standards of this Permit, the Control Officer shall issue a written notice to the owner and/or operator of the dust-generating operation

explaining such determination. The owner and/or operator of a dust-generating operation shall make written revisions to the Dust Control Plan and shall submit such revised Dust Control Plan to the Control Officer within three working days of receipt of the Control Officer's written notice, unless such time period is extended by the Control Officer, upon request, for good cause. During the time that such owner and/or operator is preparing revisions to the approved Dust Control Plan, such owner and/or operator must still comply with all requirements of this Permit.

[SIP Rule 310 §403.1]

- b. The Permittee shall request a Dust Control Plan revision with a submittal in the manner and form prescribed by the Control Officer if:
 - i. The acreage of a project changes;
 - ii. The permit holder changes;
 - iii. The name(s), address(es), or phone numbers of person(s) responsible for the submittal and implementation of the Dust Control Plan and responsible for the dust-generating operation change; and
 - iv. If the activities related to the purposes for which the Dust Control permit was obtained change.

[SIP Rule 310 §403.2]

36. Recordkeeping:

The Permittee shall maintain the following records for the time period specified in Condition 37 and make them available to the Control Officer upon request:

- a. The Permittee shall keep a written record of self-inspection on each day dust-generating operations are conducted. Self-inspection records shall include daily inspections for crusted or damp soil, trackout conditions and clean-up measures, daily water usage, and dust suppressant application. Such written record shall also include the following information:
 - i. Method, frequency, and intensity of application or implementation of the control measures;
 - ii. Method, frequency, and amount of water application to the site;
 - iii. Street sweeping frequency;
 - iv. Types of surface treatments applied to and maintenance of trackout control devices, gravel pads, fences, wind barriers, and tarps;
 - v. Types and results of test methods conducted;
 - vi. If contingency control measures are implemented, actual application or implementation of contingency control measures and why contingency control measures were implemented;
 - vii. List of subcontractors' names and registration numbers updated when changes are made; and
 - viii. Names of employee(s) who successfully completed dust control training class(es), date of the class(es) that such employee(s) successfully completed, and name of the agency/representative who conducted such class(es).

[SIP Rule 310 §502.1]

b. Upon verbal or written request by the Control Officer, the log or the records and supporting documentation shall be provided as soon as possible but no later than 48 hours after the request, excluding weekends. If the Control Officer is at the site where requested records are kept, records shall be provided without delay.

[SIP Rule 310 §§502, 503]

37. Records Retention:

The Permittee shall retain copies of approved Dust Control Plans, control measures implementation records, and all supporting documentation for at least six months following the termination of the dust-generating operation and for at least two years from the date such records were initiated.

[SIP Rule 310 §503]

Solvent Cleaning

38. Solvent Requirements:

The Permittee shall not use any VOC containing solvents in any cleaning machines.

Woodworking Operations

39. Controls:

- a. The Permittee shall insure that all sawing, sanding, routing, carving, cutting, drilling and machining tools, which are not hand-held or manually operated shall be:
 - i. Exhausted without by-pass to an existing permitted and properly functioning ECS, Cyclone EQ 29; or,
 - ii. Vented inside of a building with the exhaust directed away from any opening to the building exterior.

For the purposes of this Permit Condition, a properly functioning ECS shall be defined as having a removal efficiency of at least 99% by weight for particulate matter that is supported by manufacturer's data or an outlet grain loading of < 0.01 gr/dscf by the Department approved performance test. This ECS shall be operated within the parameters specified in an approved Operation and Maintenance Plan required by this permit.

[Rule 220 §302.23(a)(1); Rule 241 §302; Rule 311 §304]

b. Hand-held or manually operated tools used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, and surface grinding wood are exempt from this requirement due to any production information provided by the Permittee in the application that indicates that the emissions from these tools are less than 2 tons of PM_{10} per year.

[County Rules Appendix D]

40. Material Limitation:

The Permittee shall limit the amount of wood waste collected from the ECS to no more than 20 tons per 12-consecutive month period.

[Rule 220 §302.2]

41. Records:

The Permittee shall maintain the following records for a period of at least five years from the date of the records and make them available to the Control Officer upon request:

- a. The Permittee shall maintain a list of the current woodworking equipment used at the facility. The list shall contain the horsepower rating of the equipment and be maintained with the permit.
- b. The Permittee shall maintain a monthly and 12-month rolling total record of the amount of wood waste generated from the facility by the end of the following month.
- c. The Permittee shall maintain records of any monitoring and maintenance requirements specified in the O&M Plan.

[Rule 220 § 302.7]

Performance Testing

42. Testing Requirements:

The Permittee shall conduct performance tests on the equipment described in subsections e. through j. of this permit condition within the period of November 1, 2019 and December 31, 2019 and then every five years thereafter. The testing deadline may be extended by the Control Officer for good cause, but in no case shall the testing deadline, including test report submittal, extend beyond 180 days after the test periods outlined above.

If the performance tests result in values greater than the emission factors referenced in Permit Condition 2, Appendix A, then Permittee shall submit an application for a permit revision to update the emissions factors in accordance with the most recent performance test.

[County Rule 270 §401][SIP Rule 27 §A][40 CFR §60.8(a)]

- a. Permittee must conduct subsequent performance tests to demonstrate compliance with all applicable PM or total metal HAP emissions limits in 40 CFR 63.10895(c) for a metal melting furnace or group of all metal melting furnaces no less frequently than every 5 years and each time Permittee elects to change an operating limit or make a process change likely to increase HAP emissions.
- b. Permittee must conduct each performance test according to the requirements in 40 CFR §63.7(e)(1), Table 1 to this subpart and paragraphs (d) through (g) of 40 CFR §63.10898
- c. Permittee must conduct each opacity test for fugitive emissions according to the requirements in 40 CFR §63.6(h)(5) and Table 1 to this subpart. Subsequent performance test must be conducted to demonstrate compliance with the opacity limit in 40 CFR §63.10895(e) no less frequently than every 6 months and each time you make a process change likely to increase fugitive emissions.
- d. In the performance test report, Permittee must certify that the capture system operated normally during the performance test.

[40 CFR §63.10898]

e. Dracco MKII Baghouse EQ. 1 and Torit 208 Cartridge Dust Collector EQ. 52

The Dracco MKII Baghouse receives emissions from Electric Arc Furnaces #2, and #3 and the Ladle Repair Booth then discharges to the atmosphere. The Torit 208 Dust Collector receives emissions from EAF #4 and #5 and then discharges to the atmosphere.

Testing shall be performed for the emissions of carbon monoxide (CO), nitrogen oxides (NOX), sulfur dioxide (SO2), particulate matter (PM10) and Volatile Organic Compounds (VOC.

Testing shall be performed for the emissions of the following metals: antimony (Sb), arsenic (As), cadmium (Cd), chromium (Cr), copper (Cu), lead (Pb), manganese (Mn) and nickel (Ni).

Testing shall be performed in order to demonstrate a minimum of 99% by weight removal efficiency for PM or demonstrate that stack emissions do not exceed 0.01 gr/dscf of PM10 and to establish a site specific emission factor for each of the pollutants.

f. Torit DFT4-224 Cartridge Dust Collector EQ. 2 (North and South)

The Torit DFT4-224 units receive fugitive emissions from the operating area containing the Electric Arc Furnaces. The inlet flow is split between the units with approximately one-half going to each. The units discharge through a single stack to the atmosphere

Testing shall be performed for the emissions of carbon monoxide (CO), nitrogen oxides (NOX), sulfur dioxide (SO2), particulate matter (PM10) and Volatile Organic Compounds (VOC.

Testing shall be performed in order to demonstrate a minimum of 99% by weight removal efficiency for PM10 or demonstrate that stack emissions do not exceed 0.01 gr/dscf of PM10 and to establish a site specific emission factor for each of the pollutants.

g. Dust Collector, ICA 625-14C, EQ 27 and Dust Collector, ICA/AAF Millenium, EQ 28 and Dust Collector, AAF Millenium 192-14-3602, EQ 31

Dust Collector ICA 625-14C EQ 27 receives emissions from the east shakeout equipment and Dust Collector ICA/AAF Millenium EQ 28 receives emissions from the west shakeout equipment Dust Collector AAF Millenium EQ 31 receives emissions from the East and West Mold shakeout. EQ 31 is supplemental to each shakeout hood. All three discharge to the atmosphere.

Testing shall be performed for the emissions of carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO2), particulate matter (PM10) and volatile organic compounds (VOC), exiting each of said dust collectors.

Testing shall be performed in order to demonstrate a minimum of 99% by weight removal efficiency for PM10 or demonstrate that stack emissions do not exceed 0.01 gr/dscf of PM10 and to establish a site

specific emission factor for each of the pollutants.

h. AAF Millenium Baghouse, EQ 32 and Carbon Adsorption, Fabric Filters, Odor Abatement System, EQ. 33[Units #1and #2].

This Equipment operates as a unit. Baghouse EQ 32 receives emissions from mold pouring. EQ 32 then discharges into the two Carbon Units EQ. 33[Units #1 and #2] which discharge through a single stack to the atmosphere.

Testing shall be performed for the emissions of carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO2), particulate matter (PM10) and volatile organic compounds (VOC), exiting the carbon adsorption odor control units common stack.

During the performance testing, the carbon beds shall not be at or approaching the organic compound breakpoint. During each test run, the Permittee shall record the time of day and then immediately sample the carbon adsorption odor control system outlet stack exhaust utilizing the same organic vapor analyzer, or similar device, that will be used for the weekly sampling of the outlet stack exhaust as outlined in Permit Conditions 14(i). The volatile organic compounds (VOC) concentration at the outlet stack shall be used as a basis for the determination that the activated carbon has reached the breakpoint and is approaching organic compound breakthrough for the system.

Testing shall be performed in order to demonstrate a minimum of 99% by weight removal efficiency for PM10 or demonstrate that stack emissions do not exceed 0.01 gr/dscf of PM10 and to establish a site specific emission factor for each of the pollutants.

i. Baghouse, AAF Millenium, Thermfire, EQ. 15

The Baghouse, AAF Millenium receives emissions from two Thermfire Units EQ. #14A and 14B, and then discharges to the atmosphere.

Testing shall be performed for the emissions of carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO2), particulate matter (PM10) and volatile organic compounds (VOCs). The performance testing shall be performed in order to demonstrate a minimum of 99% by weight removal efficiency for PM10 or demonstrate that stack emissions do not exceed 0.01 gr/dscf of PM10 and to establish a site specific emission factor for each of the pollutants.

i. Baghouse – Torit RF Baghouse EO 12

Baghouse - Torit RF Baghouse EQ 13

Dust Collector-AAF Millenium, EQ. 40

Baghouse-Mikropul, EQ. 42

Baghouse-Jet III 108, EQ. 44, and

Dust Collector – MAC 2 Flow Cartridge Filter, EQ. 49

081-DCTL-084-B-C-M Pulse Jet Dust Collector EQ 65

100-DCTL-084-B-C-M Pulse Jet Dust Collector EQ 66

The Torit RF Baghouse EQ 12 receives emissions from the West Dideon Sand Reclaim System EQ 55 The Torit RF Baghouse EQ 13 receives emissions from the East Dideon Sand Reclaim System EQ 56

The Dust Collector AAF Millenium EQ. 40 receives emissions from the Swing Grinder work area in the Finishing Department and then discharges to the atmosphere.

The Baghouse – Mikropul, EQ. 42 receives emissions from the Shot Blast Wheelabrator Table Blast, EQ. #41 and then discharges to the atmosphere.

The Baghouse – Jet III 108 EQ. 44 receives emissions from the Wheelabrator Jet Wheel Blast house EQ. #43 in the Finishing Department and then discharges to the atmosphere.

The Dust Collector – MAC 2 Flow Cartridge Filter EQ. 49 receives emissions from the Arc Washing Station EQ. #5 (on the deminimis equipment list) in the Finishing Department and then discharges to the atmosphere.

The Pulse Jet Dust Collector EQ 65 receives emissions from the Mold 60 Mixer EQ 9 and the Pulse Jet Dust Collector EQ 66 receives emissions from the Mold 80 Mixer EQ 11.

Testing shall be performed for the emissions of particulate matter (PM10). The performance testing shall be performed in order to demonstrate a minimum of 99% by weight removal efficiency for PM10 or demonstrate that stack emissions do not exceed 0.01 gr/dscf of PM10 and to establish a site specific emission factor for each of the pollutants.

43. Testing Criteria:

Performance tests shall be conducted and data reduced in accordance with the test methods and procedures specified in the Test Methods section of this permit condition unless otherwise specified by the Control Officer and/or Administrator. The Control Officer and/or Administrator may specify or approve minor changes in methodology to a reference method, approve the use of an equivalent test method, approve the use of an alternative method that has been determined to be acceptable for demonstrating compliance, or waives the requirement for performance tests because the Permittee has demonstrated by other means that the source is in compliance with the standard. For NSPS facilities, only EPA has the authority to waive initial testing requirements.

[County Rule 270 §402][SIP Rule 27 §B][40 CFR §60.8(b)]

44. Test Methods:

- a. Sampling sites and velocity traverse points shall be selected in accordance with EPA Test Method 1or 1A.
- b. The gas volumetric flow rate shall be measured in accordance with EPA Test Method 2, 2A, 2C, 2D, 2F, 2G or 19.
- c. The dry molecular weight shall be determined in accordance with EPA Test Method 3, 3A or 3B.
- d. The stack gas moisture shall be determined in accordance with EPA Test Method 4.
- e. Total VOC testing shall be conducted in accordance with EPA Test Method 25 or 25A.
- f. NOx testing shall be conducted in accordance with EPA Test Method 7E.
- g. CO testing shall be conducted in accordance with EPA Test Method 10.
- h. SO2 testing shall be conducted in accordance with EPA Test Method 6.
- i. PM10 testing shall be done in accordance with EPA Test Method 5.
- j. Metals testing shall be conducted in accordance with EPA Test Method 29.

These methods must be performed, as applicable, during each test run.

[County Rule 270 §301.1][SIP Rule 27 §B]

45. Operating Conditions:

Performance tests shall be conducted under representative operating conditions and all equipment shall be operated during testing in accordance with the most recently approved O&M Plan or according to its operations manual if no O&M Plan is required. The Permittee shall make available to the Control Officer any records necessary to determine appropriate conditions for performance tests. Operations during periods of startup, shutdown, and equipment malfunction shall not constitute representative conditions for performance tests unless otherwise specified in the applicable standard or permit conditions.

[County Rule 270 §403][SIP Rule 27 §B][40 CFR §60.8(c)]

46. Monitoring Requirements:

The Permittee shall record all process and control equipment information that are necessary to document operating conditions during the test and explain why the conditions represent normal operation. Operational parameters shall be monitored and recorded at least once every 30 minutes during each of the required test runs and documented in the test report. The operational parameters monitored shall be capable of indicating that the equipment is operating within the permitted limits, both during and after the performance tests.

[County Rule 270 §301.1][SIP Rule 27 §B]

47. Test Protocol Submittal:

The Permittee shall submit a separate test protocol for each performance test to the Department for review and approval at least 30 days prior to each performance test. The test protocol shall be prepared in accordance with the most recent version of the Department's "Air Quality Performance Test Guidelines for

Compliance Determination in Maricopa County." A completed copy of the Department's "Test Protocol Submittal Form" shall accompany each test protocol.

[County Rule 270 §301.1][SIP Rule 27 §B]

48. Notice of Testing:

The Permittee shall notify the Department in writing at least two weeks in advance of the actual date and time of each performance test so that the Department may have a representative attend.

[County Rule 270 §404][40 CFR §60.8(d)]

49. Testing Facilities Required:

The Permittee shall install any and all sample ports or platforms necessary to conduct the performance tests, provide safe access to any platforms and provide the necessary utilities for testing equipment.

[County Rule 270 §405][SIP Rule 42][40 CFR §60.8(e)]

50. Minimum Testing Requirements:

Each performance test shall consist of three separate test runs with each test run being at least one hour in duration unless otherwise specified in the applicable standard or in this permit. The same test methods shall be conducted for both the inlet and outlet measurements, if applicable, or justification for any necessary exceptions shall be provided in the test protocol. Emissions rates, concentrations, grain loadings, and/or efficiencies shall be determined as the arithmetic average of the values determined for each individual test run. Performance tests may only be stopped for good cause, which includes forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of a performance test without good cause after the first test run has commenced shall constitute a failure of the performance test.

[County Rule 270 §406][40 CFR §60.8(f)]

51. Test Report Submittal:

The Permittee shall complete and submit a separate test report for each performance test to the Department within 30 days after the completion of testing. The test report shall be prepared in accordance with the most recent version of the Department's "Air Quality Performance Test Guidelines for Compliance Determination in Maricopa County". A completed copy of the Department's Test Report Submittal Form shall accompany each test report.

[County Rule 270 §301.1][SIP Rule 27 §B]

52. Compliance with Emission Limits:

Compliance with allowable emission limits and standards shall be determined by the performance tests specified in this permit. If test results do not demonstrate compliance with the requirements of these permit conditions, the Permittee shall make the necessary repairs and/or adjustments to the equipment and demonstrate compliance through retesting. This will not nullify the fact that test results did not demonstrate compliance with the requirements of the permit conditions or nullify any violations that may result from this noncompliance. In addition to compliance demonstrations, test results shall be used for annual emissions inventory purposes, if the Permittee is required to complete an emissions inventory survey.

[County Rule 270 §407]

53. Correspondence:

All test extension requests, test protocols, test date notifications, and test reports required by this permit shall be submitted to the Department and addressed to the attention of the Performance Test Evaluation Supervisor.

[County Rule 270 §301.1][SIP Rule 27 §B]

54. Authority:

The above testing requirements represent the minimum level of testing to monitor for compliance with the emission limits in this permit. Nothing in this section shall prevent the Control Officer from requiring additional performance testing as deemed necessary to ensure permit compliance and protection of the public health and welfare.

[County Rule 200 §309][County Rule 270 §402.5]

GENERAL CONDITIONS

55. Posting of Permit:

This Permit shall be posted in a clearly visible and accessible location on the site where the equipment is installed.

[Rule 200 §312]

56. Compliance:

a. The issuance of any Permit or Permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a Permit or Permit revision required under the County Rules.

[Rule 200 §309][Rule 220 §406.3][Locally Enforceable Only]

b. The Permittee shall comply with all conditions of this Permit including all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations now in effect and as amended in the future. Any Permit noncompliance is grounds for enforcement action, Permit termination or revocation, or for denial of a renewal application. In addition, non-compliance with any federally enforceable requirements constitutes a violation of the Clean Air Act.

[A.A.C. R18-2-306.A.8.a][Locally Enforceable Only]

c. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with these Permit Conditions.

[Rule 220 §302.10][A.A.C. R18-2-306.A.8.b][Locally Enforceable Only]

d. Rights and Privileges: This Permit does not convey any property rights or exclusive privilege of any sort.

[Rule 220 §302.12][Locally Enforceable Only]

e. Fees: The Permittee shall pay all fees to the Control Officer in accordance with Rule 280. No permit or permit revision is valid until the applicable permit fee has been received and until the permit is issued by the Control Officer.

[Rule 200 §409][Rule 280 §302][A.R.S. 49-480(D)][SIP Rule 28]

57. Malfunctions, Emergency Upsets, and Excess Emissions:

An affirmative defense of an emergency, excess emission, and/or during startup and shutdown shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence as outlined in Rule 130 for emergencies and Rule 140 for excess emissions.

[Rule 130 §§201, 400][Rule 140 §§400, 500][SIP Rule 140]

58. Revision / Reopening / Revocation:

The Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[Rule 220 §302.11][Locally Enforceable Only]

59. Records:

a. The Permittee shall furnish information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. The information shall be provided in a timeframe specified by the Control Officer. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator along with a claim of confidentiality.

[Rule 220 §302.13][SIP Rule 40]

o. If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application is filed but prior to release of a proposed permit. Willful misrepresentation of facts in a permit application is cause for revocation or denial of a permit.

Revision Date: 08/18/2015

60. Right to Entry:

- a. The Control Officer during reasonable hours, for the purpose of enforcing and administering County or SIP Rules or the Clean Air Act, or any provision of the Arizona Revised Statutes relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under A.R.S. 49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.
- b. The Permittee shall allow the Control Officer or his designated representatives, upon presentation of proper credentials (e.g., Maricopa County Air Quality Department identification) and other documents as may be required by law, to:
 - i. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept pursuant to the conditions of the permit;
 - ii. Have access to and copy, at reasonable times, any records that are required to be kept pursuant to the conditions of the permit;
 - iii. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;
 - iv. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the Permit or other applicable requirements; and
 - v. To record any inspection by use of written, electronic, magnetic, and photographic media. [Rule 100 §105][Rule 220 §302.17-21][SIP Rule 43]

61. Severability:

The rules, paragraphs, clauses, provisions, and/or sections of this Permit are severable, and, if any rule, paragraph, clause, provision, and/or section of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

[Rule 220 §302.9][SIP Rule 80]



APPENDIX A: PERFORMANCE TESTING CONDUCTED DECEMBER 2014

	PM10	PM	CO	SOx	NOx	VOC	Antimony	As	Cd	Cr	Cu	Pb	Mn*	Ni	Phenol	Toluene	Xylene	Formalde	Benzene	2,2,4-	D. f T D D
EMISSION FACTORS																		hyde		trimethyl pentane	Performance Test Dates/Data Source
EQ 1 Dracco Baghouse - EAF 2, EAF 3, and Ladle Repair	0.26	0.26	1.37	0.04	0.49	0.03	6.5E-05	1.9E-04	7.3E-06	6.4E-05	5.6E-05	5.9E-05	1.4E-04	4.6E-05	0	0	0	0	0	0	Dec-14
EQ 52 East Torit - EAF 4, EAF 5	0.29	0.29	0.60	0.20	2.43	0.10	8.2E-05	2.2E-04	1.4E-05	1.7E-03	1.5E-04	1.7E-04	1.2E-03	9.8E-05	0	0	0	0	0	0	Dec-14
EQ 2 North Torit - General Melt Area	0.10	0.10	0.13	0.02	0.02	0.13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14
Natural Gas Burning (heat treat, ladel heaters, plant heat) (lb/MMCF)	7.6	7.6	84	0.6	100	5.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	AP-42 Table 1.4-2 (1-03-006-03)
EQ 65 (60 Mixer) EQ 66 (80 Mixer) No-Bake molding - mixing (lb/ton poured, VOC lb/ton sand)	0.5	0.5	0	0	0	0.0932	0	0	0	0	0	0	0	0	0	0	0	0	0	0	PM Gutow 1971, VOC CERP 1411- 113 2005
EQ 15 No-bake sand reclaimation, Thermal Sand Reclaimer (lb/Ton	0.25	0.25	3.33	2.40	0.38	0.33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14
EQ 32 and 33 Pouring and Cooling (lb/Ton of metal poured into Molds)	0.05	0.05	0.84	0.02	0.01	0.11	0	0	0	0	0	0	0	0	0	6.6E-03	7.9E-04	0.0E+00	1.3E-02	0	Dec-14
EQ 28 West Mold Shakeout (lb/Ton of Sand)	0.013	0.013	0.01	0.006	0.00058	0.017	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Jul 2013, CO Dec 2014
EQ 27 East Mold Shakeout (lb/Ton of Sand)	0.039	0.039	0.14	0.005	0.00071	0.036	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Jul 2013, CO Dec 2014
EQ 31 East and West Mold Shakeout ventilation (lh/Ton of Sand)	0.012	0.012	0.02	0.0049	0.000126	0.0148	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Jul 2013, CO Dec 2014
EQ 13 East Torit Attrition	0.03	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14
EQ 12 West Torit Attrition	0.01	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14
EQ 44 Shotblast - Jet Blast monorail blast machine (lb/Ton of Metal)	0.02	0.02	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14
EQ 42 Shotblast-Finishing Collectors, Tableblast (lb/Ton of Metal)	0.20	0.20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14
EQ 25 New Sand Storage, (lb/Ton of	0.54	0.54	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	AIRS (3-04-007-06)
EQ 19 - 24 Sand Storage, Sand Silos	0.54	0.54	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	AIRS (3-04-007-06)
EQ 40 Swing Grinding (lb/Ton of Metal)	0.03	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Dec-14